

March 17, 2008

Federal Communications Commission  
c/o Marlene Dortch  
445 12th Street SW  
Washington, DC 20554

Re:Ex Parte 07-51

Dear Ms. Dortch:

On March 14, 2008, the undersigned had a telephone conference call with representatives of the Media Bureau including Mr. John Norton, Mr. John Berresford and Ms. Nancy Murphy. The following represents topics and substance of the 45 minute conversation.

Century Communications of FL. Inc. currently provides service to 22 communities representing over 11,000 homes when the communities have been completed. In addition, Century has agreements to provide service to another 15,000 + homes in future planned communities.

In a majority of these communities, Century provides cable TV, high-speed internet access & alarm monitoring on the basis of bulk billing the HOA. Century also provides non-bulk billed services in 3 communities & operates on a non-exclusive basis in some communities that are bulk billed. Century provides services in newly constructed planned communities. Century's networks are all state-of-the-art hybrid fiber/coax 870 MHz & 1 GHz design as of 2007.

Beyond the network infrastructure, there is a significant investment in the home alarm monitoring hardware.

Century has a significant investment in service. We have a ratio of 1 employee per 300 customers, 1 customer service representative per 1,000 customers & 1 field service technician per 1,000 customers. Our regular customer service operations are available from 8AM-8PM, Monday-Friday & 9am-5pm on Saturday. A live operator can be reached 24/7/365 for emergency response & a technician will respond to any outage typically within 4 hours.

Century significantly exceeds any established service performance metrics, typically answering a minimum of 96% of all calls monthly & responding to service requests within 24 hours. Our service response is particularly important vis-à-vis the environment of disruption of service as the result of outside agencies performing home construction services. A nimble response is a must.

Century pursues a constant effort in preventative maintenance & proof-of-performance. Still, plant issues can be insidious & at times we experience problems that exceed our normal resolution response goals by virtue of the ongoing activity within the community.

A majority of the issues that Century customers encounter are the result of structured wiring issues within the home. The structured wiring within the home is not installed by Century. Many of our customers are, for the first time, living in a home with a “home network” and their problems become Century’s problems. This can taint the homeowner attitude toward Century. In one of our larger communities,

we spent hundreds of man hours going door-to-door, working with HOA board members to identify customers who were experiencing various issues. A majority of the problems were resolved within the customer's home. Still, we were labeled as offering poor service.

Like most private cable operators, Century faces the challenge of limiting & prohibitive programming aggregation contracts & internet facilities acquisition. This is the source of our greatest customer dissatisfaction. Bulk programming contracts are often based on a phased billing plan that can artificially inflate costs to the PCO as programming rates are based on developer homes sales with a maximum term. These costs are borne by the operator as the HOA contract establishes rates without taking these costs into consideration & thus causing negative amortization & a diminished ROI schedule. With certain programming aggregators, expanded programming options like HDTV are still not available.

Internet facilities acquisition may take over a year for service providers to implement, with long-term contracts required to avoid significant capital outlays. Inconsistency of product from service providers presents a challenge to private cable operators in offering comparable & ever-increasing requests for increased speeds. Century offers a 768kbps/128kbps or 1Meg/256kbps basic service to all homeowner's, depending on the community. We also offer an expanded 3Meg/750kbps including static IP & VPN service for \$14.95/month. We have transitioned most communities to scalable Metro Ethernet solutions that will

allow Century to offer on-demand increased speeds as the market may demand. Certain providers throughout Florida are not offering this product at the current time.

Century has committed to make HDTV programming options available to all our communities. Century currently offers, at no charge, access to broadcast HDTV programming. We have redesigned our networks to accommodate the reception of this programming with a standard HDTV tuner. Programming contracts affecting the 7 Century communities that do not have access to non-broadcast HDTV will come to term during 2008. This will allow Century, at the expense of replacing our current programming facility, to provide non-broadcast HDTV services to all of our customers.

Century views our contractual relationship with our HOA's as an evolving, living agreement. Century has gone beyond the contractual requirement for the provision of services in our communities. Century regularly meets with HOA Boards to discuss community interests in programming & services & we work with our HOA's & their management associations, at no cost, to assist the HOA in the management of their fee collection process, including payment arrangements for HOA's beleaguered by the current economic climate. We provide our communities with complimentary internet access at their shared facilities, including wireless hot spots for community clubhouses & pools. Century's philosophy is to provide the community with a deeply discounted customer centric, quality service to the benefit of all. We understand that we

cannot be all things to all customers & that some portion of homeowners want something more. But, just as programming exclusivity creates a market that is directed to a single provider, we feel that the enhanced nature of our customer service is what sets Century apart from other providers. This is only possible because of the bulk billing contracts that clearly benefit both the HOA & PCO.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. McKissock', with a long horizontal flourish extending to the right.

William J. McKissock

EVP/GM

Century Communications of FL, Inc.

1181 S. Rogers Circle

Suite 5

Boca Raton, FL 33487

561-961-1249